

Message

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Richard Garren

From: John Elrod [jelrod@cwlaw.com]
Sent: Friday, December 08, 2006 3:44 PM
To: Richard Garren
Subject: RE: Edmondson Deposition

I understand your position. Before I press the issue I'll hit the books.

-----Original Message-----

From: Richard Garren [mailto:RGarren@riggsabney.com]
Sent: Friday, December 08, 2006 3:38 PM
To: John Elrod
Subject: RE: Edmondson Deposition

John,

The attorney general is not the plaintiff, the State of Oklahoma is the party.

Rick

From: John Elrod [mailto:jelrod@cwlaw.com]
Sent: Friday, December 08, 2006 3:38 PM
To: Richard Garren
Subject: RE: Edmondson Deposition

Rick, he is one of the named plaintiffs. I was curious how he could be both an attorney and plaintiff in the same lawsuit when it was filed. But that was his choice. I want to depose him in his capacity as a party. If you continue in disagreement please let me know early next week so I can tee it up properly. Thanks. Have a great weekend.

-----Original Message-----

From: Richard Garren [mailto:RGarren@riggsabney.com]
Sent: Friday, December 08, 2006 2:13 PM
To: John Elrod
Subject: RE: Edmondson Deposition

John,

I have consulted with my colleagues and would request you provide to us the reasons and basis for which you propose to take the deposition of the Attorney General. Clearly Mr. Edmondson is our lead attorney on this case and it seems on its face to be an inappropriate or unjustified request.

I'll look forward to your response.

Rick

From: John Elrod [mailto:jelrod@cwlaw.com]
Sent: Thursday, December 07, 2006 10:15 AM
To: Richard Garren
Subject: RE: Edmondson Deposition

Rick, lets do it this way. Let me know your decision by the end of business next Monday so we can get something in front of the Court to hopefully be heard on the 15th if there ends up being a

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disagreement. I personally will not be there on the 15th but there are others who can carry the ball. Thanks.

-----Original Message-----

From: Richard Garren [mailto:RGarren@riggsabney.com]

Sent: Thursday, December 07, 2006 9:14 AM

To: John Elrod

Subject: RE: Edmondson Deposition

John,

I've been out of the office a few days, thus the slow response. I'm sure this request will require some discussion. Clearly we would extend the same courtesy as has been afforded me by Mr. Williams in accepting service if you in fact choose to proceed in this matter. I have no authority beyond that at this time.

Rick

From: John Elrod [mailto:jelrod@cwlaw.com]

Sent: Tuesday, December 05, 2006 10:08 AM

To: Richard Garren

Subject: Edmondson Deposition

Rick, we would like to take the deposition of the Attorney General on two days between Jan 15 and Feb 15. We think we can get it done in two. With whom should I work? Can it be done cooperatively? Thanks.

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